

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

1.

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER; AMERICAN
GATEWAYS; and THE COUNTY OF EL
PASO, TEXAS,
Plaintiffs,

v.

Cause No. 1:23-cv-1537

STEVEN C. MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety, and BILL
HICKS, in his official capacity as District
Attorney for the 34th District,
Defendants.

STARR'S REPLY TO PARTIES OBJECTION TO STARR'S INTERVENTION

COME NOW, Carl Starr and responds: The 5TH Cir has made clear a
intervention should be allowed when no one is hurt. Sierra Club v
Espy 18 F.3d 1202 [1994] Permissive intervention "is to be
liberally construed" in favor of intervention Ricks 417 F. Supp
2d 403 nevertheless a pro se layman. With "all doubts" favoring
intervention Acree 370 F.3d 41, 49 [2004]. See: Page at WL 5519052
[2021] [Grant of permissive intervention where intervenor raised
common questions of law or fact]Starr has Article 3 standing as
much as the parties do before SB 4 takes effect March 5 2024.
Besides Five or more Circuits have held a intervenor need not
have Article 3 standing to come before a federal court. See:
Intervening in the Case (or Controversy): Article III Standing,
Rule 24 Intervention, and the Conflict in the Federal Courts BYU

Law Review [2003] Intervenors do not always have a cause of 2.
action See 452 F. Supp 2d at 69. Starr has a protectable interest
and it is better to stand with the Plaintiffs now than they face
a Hobsons Choice later and further more a denial now would be a
Final Order. See Keel 972 F 2d 482, 485 [1992]Finally see Berg 268
F.3d 810, 817-18 [2001]where intervenor had a reliance interest
that would be affected if the agreement were invalidated.

Respectfully Submitted, Electronic signed \Carl Starr\ 1-22-24
I certify the forgoing was emailed to the Plaintiffs 1-22-24 and land
mailed to the Defendants and the Court 1-23-24. \Carl Starr\



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ORDER

The Court having considered Starr's motions and the Parties
response and Starr's response to the Parties response, hereby
grants Starr's Intervention but limits it the following ways:

JUDGE_____

DATED_____